

Project Review Comments			Type: DMMP Concept: Final: xx Other:	Page 1 of ____ <hr/> Date: 5/23/02
Project: UMR & IWW Restructured Navigation Study – Draft Interim Report Location:			Reviewer: Name: ____Gretchen Benjamin____ Organization: ____WDNR____	
Comment Number	Drawing/ Number	Page/ Space	COMMENT	ACTION
1		16, last para graph	<p>The recreation study you are referencing is done in 1990 dollars - if Bruce Carlson were here he would correct you. The document came out in 1993.</p> <p>Also the reference to Yellowstone NP is not good. I believe Blue Ridge Parkway gets more visitors than Yellowstone NP and UMR visitation exceeds that parkway.</p>	<p>Revised economics of recreation details as suggested.</p> <p>The reference to Yellowstone was left in based on other reviewers comments and the greater recognition of Yellowstone over Blue Ridge Parkway. The Parkway example is also somewhat biased by a highway running through it for which administrators tally vehicles using the Parkway as visitors.</p>
2		19 - 4 th par.	<p>The reorganizing of the Economic portion of the study is the reason the study was delayed in the spring of 1998. Environmental studies had to be completed during the timeframe allotted.</p>	Noted.
3		21	<p>NECC has meet 36 times (or is it 37). The minimum Wisconsin has spent to participate in all those meeting is \$40,000.00</p>	Text revised to read “over 30 times”.

4		22	The reference to the 23.73 million spent on the environmental portion of the study is unfair. The POS in 1989 dollars was valued at 26 million. Rather than separating out that cost it was rolled into the Navigation Studies making the environmental portion of the study appear artificially high. The commercial navigation industry uses these numbers to complain about the cost of doing environmental studies.	Noted. This section is capturing actual work completed to date.
5		33	The vision statement is actually a mission statement.	It is our recollection that the NECC/ECC called it a vision statement, thus the wording reflects the record.
6		35	Second full paragraph suggests that unconstrained funding will be available for the without and with project future. This is not based in any reality. You must have some statistics as to what portion of projects are backlogged due to lack of funds. If you provide that information to congress they may think that UMRS activities have been over funded.	It is standard Corps practice to conduct initial project formulation independent of financial constraints so that all possibilities can be considered. Financial and other constraints are considered during the consideration of alternatives.
7	Table 1		Land use stressors should include - Decreased water infiltration contributing to increased surface runoff.	Inserted " decreased infiltration creating increased volume and force of upland runoff" per comment.
8		40	Pool planning was initiated by the Fish and Wildlife Work Group. It was an interagency activity that involved everyone.	Revised per comment.

8		44 2 nd par.	If only 7 million tons moves through Thomas J. O'Brien lock it certainly makes one wonder if it is worth the ecological disaster it has created.	Noted.
9		52 & 53	The last sentence in this paragraph talks about the valuable submerged aquatic habitat that channel training structures provide. It is important to point out these are REPLACING the natural structures that were once in the river that did provide habitat for aquatic invertebrates and fish. Stags, huge beds of native mussels and rapids/waterfalls used to be the structure in the river. All of those structures have been lost due to the commercial navigation channel. If you want to make the claim that channel structures are habitat it will have to be followed with the statement, "In most cases these structures are replacing naturally occurring habitat such as stags, rapids and native mussel beds.	Revised: Channel clearing activity removed much of the natural structure found in numerous woody snags and mussel beds. Wing dikes and other submerged structures provide aquatic habitat, substrate, and structure important to many aquatic invertebrates and fishes.
10		57	In the second paragraph I would have the exact same comment as nine. I would eliminate the sentence that states; "Training structures do, ... to many organisms. The organisms in the river using the channel structures did not evolved to use wingdams etc; they are substituting them for better habitat.	Noted and revised.
11		60	Wisconsin has 20 professional staff (12 biologists and 8 wardens) and three offices on the river. We have cost shared on numerous projects with the Corps and other agencies. I think the number for State contribution to the environmental management on the river is much too low. (I figure Wisconsin spend at least a million dollars on the river.)	The numbers used were from the UMRCC document estimating restoration costs. Citation added.
12		61	The avoid and minimize program is in the St. Louis District.	Table corrected.

13		61	<p>How is CARS an environmental program? It is a river training structure programs.</p>	<p>The CARS provides an opportunity to review all aspects of training structures, including opportunities to alter or build them for environmental benefit.</p>
14		62	<p>In the second full paragraph, I think it is incorrect to say that boating pressure decreases somewhat as one moves downstream. Boating pressure decreases significantly below the Quad Cities. As one of your Mississippi River Commissions said as he passed through the northern pools he sees more recreational craft in one day than he does all year down south.</p>	<p>Noted, “somewhat” removed, but “significant” not added because of conflicting comments from reviewers in southern river reaches..</p>
15		63	<p>In the first full paragraph I believe you are suggesting that formal recreation management may be needed in the future. However the point is lost.</p> <p>I would suggest. Use the first sentence then... However, to date there is no one agency that has management responsibilities for recreation on the river. Currently, visitors have used lands, public and private, along the UMR system for primitive camping sites. As recreation use continues to grow it may become necessary to establish managed recreation sites (overnight and potentially day use) on the river to minimize the impact to the natural resources and to provide safe campsites complete with sanitary facilities. This change would probably require some type of registration/reservation system and an appropriate number of rangers to enforce the new system. Any effort to create this type of recreational management change on the Mississippi River will require extensive public involvement and consensus.</p>	<p>Comment noted and understood, however, other comments have caused us to revise references to recreation as a prominent factor in this study.</p>

16		73	What happens after 2040? In Figure 17 total farm product movement by scenario goes in almost every case.	Production rates are increasing at a lower rate than consumption rates, which results in less available for exports.
17		75	First sentence, last paragraph should read, "There are many aspects of river channel...or even promote environmental restoration ." We're working in a degraded system and these activities simply restore lost attributes (not enhance them).	Revised per suggestion.
18		76	In the top paragraph there is an incorrect statement. The USFWS established closed areas to waterfowl hunting. These areas are not closed to recreational boating and fishing. Most closed areas are difficult to navigate so fishing and recreational boat traffic is almost non-existent especially during the waterfowl migration.	Revised per comment.
19		77	First paragraph, fifth sentence, the Pool 8 drawdown was done in 2001 and if conditions are favorable, it will be repeated in 2002 at about half of the original level.	Revised.

20		79	<p>I submit that the first paragraph paints the river resource managers as incompetent. I would suggest the following wording.</p> <p>"Understanding a complex ecosystem like the Upper Mississippi River is very difficult. There are no comprehensive databases that span decades that could track exactly what has happened to fish, wildlife, invertebrates, water quality or plant life on the river. River resource managers are continually asked to provide desirable future habitat conditions in terms of specific quantifiable goals. However, the basic workings of the ecosystem are not fully understood to compose these goals. Based on professional judgment, river resource managers know that the basic elements of the ecosystem, habitat quality, habitat diversity and hydrologic variability must be restored if the long-term viability of the system is to be improved. Primary stressors to river ecosystem like river regulation, sedimentation, erosion and floodplain development will require new approaches to balance the multiple uses on the river and conserve the internationally significant ecosystem of the Upper Mississippi River.</p>	<p>Revised per Fish and Wildlife Service:</p> <p>Natural resource managers were asked to express their desired future conditions for river resources during the first habitat needs assessment (HNA). As part of this exercise, it was necessary to assess the likely future without project condition, based on their individual experience and sphere of knowledge. While their response indicated that there was inadequate systemic data to compare or contrast rates of change river-wide, they did indicate a continued downward trend in resource condition in areas they were familiar with. These changes were largely due to impoundment effects from water level regulation, sediment redistribution, and loss of floodplain cover types.</p>
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21		96	In the last paragraph there is reference to Winters Landing as an O&M habitat project. Winters' Landing is an element of the channel realignment in Pool 7.	Winter's Landing removed.
22		98	Thalweg placement of dredge material is not a habitat management tool.	Thalweg placement has environmental benefits in that it foregoes placement in more sensitive habitats.
23		100	One of the bullets suggests that there should be included funding to A&M. However it is my understanding that A&M has never been funded as a separate pot of money it has simply been taken from other O&M money. So, it should say, Fund Avoid and Minimize activities.	On a few occasions special funds were transferred to the MVS O&M account to help support A&M. There were also some CG funds allocated to the project in the past.
24		100	A sentence should be inserted in the first paragraph after the sixth sentence. "This overdraft dredging will be monitored to determine if it results in decreased dredging in future years and therefore reduces the overall cost of the drawdown."	Revised per suggestion.
25		105	In the last paragraph, first sentence - eliminate the word "even" before land acquisition.	Revised per suggestion.

26		109	<p>The alternatives laid out do not recognize that it is a combination of tools that needed to restore the ecological balance on the river. I go back to the alternatives I raised a number of months ago that include, no action, stable, restored, sustained and enhanced. Each one of those alternatives would include elements of alternative A-G.</p> <p>The issue of land acquisition is missing from alternatives A-G. Floodplain reconnection will not happen without this element available. It must be added to the range of alternatives necessary to restore ecosystem integrity.</p>	<p>Concur</p> <p>Floodplain connectivity goals and objectives will be established as part of the navigation study. The potential implementation of these actions will be addressed in the Comp Study as related to flood damage reduction.</p>
27		113	<p>Under number 5, the sentence should read, "Navigation traffic increases are anticipated as a result of the current system and any improvements. Based on previous investigations navigation traffic is expected to have the following direct effects on natural resources."</p>	<p>Revised per suggestion.</p>
28		113	<p>Under section c there is no acknowledgement of zebra mussel impact on the native mussel fauna as a result of commercial navigation. This is a significant oversight.</p>	<p>Zebra mussel impacts have been addressed through other efforts, primarily the USFWS biological opinion, which has been referenced for this effort.</p>
29		113	<p>At the bottom of the page, the idea of creating revetment walls underwater to protect aquatic plants is a method that is not necessarily accepted by the natural resource manager on the river. There is enough artificially placed rock in the river we don't need to use it for mitigation.</p>	<p>Noted.</p>
29		115	<p>Implementation issues fails to describe some important partners who have authority on the river. The state DNRs, DOC, DOTs, and PCA all have significant roles to play in terms of authority on the river. The U.S. Coast Guard and U.S. Department of Transportation also have significant authority on the Mississippi River.</p>	<p>Concur. See revisions to Sec 3.4 Other Agency and Organization Contributions.</p>

30		118	If you are going to list FWIC then you should list all the groups. Under the umbrella of the RRF, we have the On Site Inspection Team (OSIT), Navigation Work Group (NWG), the Recreation Work Group (RWG) and the Water Level Management Task Force (WLMTF). The RRF has evolved beyond the basic working of the forum structure.	This section has been deleted. See revised Sec 3.4.
31		123	Under number 2, Conclusion - Maintaining should be replaced by Restoring.	This section has been revised. See revised Sec 3 in final Interim Report.
32			General observation 1 - I assumed this document would lie out the plan for the feasibility study. Are the first few months of the feasibility study going to be consumed with the "what next" question? If so I think we wasted some valuable time during the Interim Report stage.	The project Management Plan for the remainder of the feasibility study will be summarized in a revised section 3.

33			<p>General observation 2 - Where is the low hanging fruit?</p>	<p>The guidance for restructuring of the navigation study allowed for identification of measures that could be recommended for implementation prior to completion of the feasibility study. The Interim Report does not contain any recommendations for moving forward with interim measures. Many comments were received that suggested small-scale measures such as mooring cells and guidewall extensions be considered for immediate implementation. These measures have been discussed in past efforts; however, the economic evaluation of small-scale measures has not been completed. In addition, the environmental analysis describing the impacts of incremental traffic increases from these types of measures is also not complete.</p> <p>Both of these evaluations will be included in the</p>
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